

LAW OFFICES  
**NEIL M. SCHUSTER**

SUITE 2C  
555 N.E. 15<sup>th</sup> STREET  
MIAMI, FLORIDA 33132

NEIL M. SCHUSTER \*  
ANDREW HORN  
OF COUNSEL  
\*ALSO ADMITTED IN COLORADO &  
DISTRICT OF COLUMBIA.

TELEPHONE (305) 416 - 0324  
TELECOPIER (305) 416 - 0325  
e-mail: neil@neilmschuster.com

November 12, 2020

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Zalmund Zirkind*, S9 19 Cr. 463 (DLC)**  
LETTER MOTION TO AMEND BOND CONDITIONS TO ALLOW TRAVEL TO  
LOCAL CEMETERY (THE OHEL)

Dear Judge Cote:

This letter is respectfully written to permit the Defendant to travel to the "The Ohel," 226-20 Francis Lewis Boulevard, Cambria Heights, NY 11411 and pray. The Ohel, where the Lubavitcher Rebbe, Rabbi Menachem M. Schneerson, was laid to rest next to his father-in-law, the sixth Lubavitcher Rebbe, Rabbi Yosef Y. Schneerson, is described as a location where one's prayers focus on working toward new good deeds and spiritual stock-taking. It is anticipated that a round-trip prayer visit would require three to four hours, depending on traffic patterns. The Defendant respectfully seeks the opportunity to pray at the Ohel in advance of sentencing. Physically, the location is a walled and roofless cemetery. The Defendant, if permitted to attend, will wear a mask and comply with COVID-19 legal requirements. The Ohel management also complies with COVID-19 legal requirements. Additional information about this holy cemetery is available at [https://www.ohelchabad.org/#utm\\_source=domain&utm\\_medium=domain&utm\\_campaign=Ohel.org](https://www.ohelchabad.org/#utm_source=domain&utm_medium=domain&utm_campaign=Ohel.org). This application seeks a one-time visit opportunity this month, with timely advance discussion with his supervising USPO. The undersigned discussed this application with USPO Rothman and AUSA Lake who agree to this request.

We thank Your Honor for your review.

Very truly yours,

/s/ Neil M. Schuster  
Neil M. Schuster

NMS:asnd